

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
AT CINCINNATI**

TEDDY NICHOLS,)	Case No. C-1-02-0045
)	
Plaintiff,)	Judge Beckwith
)	
v.)	
)	
INDIANA MICHIGAN POWER CO.)	
RIVER TRANSPORTATION DIVISION)	
and/or AMERICAN ELECTRIC FUEL)	
SUPPLY, RIVER TRANSPORTATION)	
DIVISION,)	
)	
Defendant.)	

NOTICE TO TAKE VIDEOTAPED DEPOSITION OF
DR. ARTHUR LEE

TO:

Gary Wm. Baun, Esq.
401 S. Old Woodward, Suite 320
Birmingham, MI 48009
Attorney for Plaintiff

WITNESS TO BE DEPOSED:

Dr. Arthur Lee

DATE AND TIME:

Thursday, March 25, 2004
at 4:00 p.m.

**PLACE DEPOSITION IS TO
BE TAKEN:** At the offices of:

Dr. Arthur Lee
Wellington Orthopaedic & Sports Medicine
7663 Five Mile Road
Cincinnati, Ohio 45230
(513) 232-6677

PLEASE TAKE NOTICE that at the above-stated date, hour and place, we shall take the stenographic and videotaped deposition of the witness above-stated, pursuant to the Federal Rules of Civil Procedure, for all purposes permitted pursuant to law, before a notary public, at which time the witness hereby being notified shall appear and at which time any party or their attorney may

appear and examine, if they may see fit.

This deposition is subject to continuance from time to time and place to place until completed.

Respectfully submitted,

Todd M. Powers, Esq. (0027122)
SCHROEDER, MAUNDRELL, BARBIERE & POWERS
11935 Mason Road, Suite 110
Cincinnati, OH 45249-3703
(513) 583-4212 (telephone)
(513) 583-4203 (facsimile)
Attorney for Defendants

CERTIFICATE OF SERVICE

____ I hereby certify that a true and accurate copy of the foregoing was served upon the following this ____ day of January, 2004:

Gary Wm. Baun, Esq.
401 S. Old Woodward, Suite 320
Birmingham, MI 48009
Attorneys for Plaintiff

Todd M. Powers